

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

DIAMOND SPORTS GROUP, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-90116 (CML)

(Jointly Administered)

**STIPULATION EXTENDING DEADLINE TO OBJECT  
TO MOTION OF MAJOR LEAGUE BASEBALL AND CERTAIN  
MAJOR LEAGUE BASEBALL CLUBS TO COMPEL  
ASSUMPTION OR REJECTION OF TELECAST RIGHTS AGREEMENTS**

Atlanta National League Baseball Club, Inc. (the “Braves”), Cleveland Guardians Baseball Company, LLC (the “Guardians”), Detroit Tigers, Inc. (the “Tigers”), Milwaukee Brewers Baseball Clubs, L.P. (the “Brewers”), and Rangers Baseball Express LLC (the “Rangers” and each of the Braves, Guardians Tigers, Brewers, and Rangers with certain of their affiliates, a “Club” and collectively, the “Clubs”) and the Office of the Commissioner of Baseball d/b/a Major League Baseball (“MLB”), and the above-captioned debtors and debtors-in-possession (the “Debtors,” and, collectively with the Clubs and MLB, the “Parties”) hereby stipulate and agree as follows:

WHEREAS, on October 11, 2023 MLB and the Clubs filed the *Joint Motion of Major League Baseball and Certain Major League Baseball Clubs to Compel Assumption or Rejection of Telecast Rights Agreements* [Dkt. 1261] (the “Motion to Compel”);

WHEREAS, the deadline to object to the Motion to Compel is currently November 1, 2023;  
and

---

<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/DSG>. The Debtors’ service address for purposes of these chapter 11 cases is: c/o Diamond Sports Group, LLC, 3003 Exposition Blvd., Santa Monica, CA 90404.

WHEREAS, the Parties have agreed to extend the deadline for the Debtors to object to the relief sought in the Motion to Compel.

**Accordingly, the Parties hereby stipulate and agree that:**

1. The deadline for the Debtors to object to the relief sought in the Motion to Compel, and any joinders to any such objection by the Debtors, shall be extended until November 6, 2023 at 5:00 p.m. CST.

2. The undersigned represent that they are authorized to execute this stipulation on behalf of the representative party for whom they have signed.

3. The Parties agree that the Court retains jurisdiction with respect to all matters arising from or related to the implementation of this stipulation, and the Parties hereby consent to such jurisdiction to resolve any disputes or controversies arising from or related to this stipulation.

Dated: November 1, 2023  
Houston, Texas

**BRACEWELL LLP**

/s/ William A. (Trey) Wood III  
William A. (Trey) Wood (Texas Bar No. 21916050)  
711 Louisiana St., Suite 2300  
Houston, Texas 77002  
Telephone: (713) 221-1166  
Facsimile: (713) 221-1212  
E-mail: trey.wood@bracewell.com

Mark Dendinger (admitted *pro hac vice*)  
CityPlace I, 34th Floor, 185 Asylum Street  
Hartford, Connecticut 06103  
Telephone: (860) 256-8541  
Facsimile: (800) 404-3970  
E-mail: mark.dendinger@bracewell.com

-and-

**SULLIVAN & CROMWELL LLP**

James L. Bromley (admitted *pro hac vice*)  
Alexa J. Kranzley (admitted *pro hac vice*)

125 Broad Street  
New York, NY 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
E-mail: bromleyj@sullcrom.com  
kranzleya@sullcrom.com

Counsel for:  
Office of the Commissioner of Baseball  
Atlanta National League Baseball Club, Inc.  
Milwaukee Brewers Baseball Club, L.P.  
Detroit Tigers, Inc.

Dated: November 1, 2023  
Houston, Texas

/s/ John F. Higgins

**PORTER HEDGES LLP**

John F. Higgins (TX Bar No. 09597500)  
M. Shane Johnson (TX Bar No. 24083263)  
Megan Young-John (TX Bar No. 24088700)  
Bryan L. Rochelle (TX Bar No. 24107979)  
1000 Main St., 36<sup>th</sup> Floor  
Telephone: (713) 226-6000  
Facsimile: (713) 226-6248  
[jhiggins@porterhedges.com](mailto:jhiggins@porterhedges.com)  
[sjohnson@porterhedges.com](mailto:sjohnson@porterhedges.com)  
[myoung-john@porterhedges.com](mailto:myoung-john@porterhedges.com)  
[brochelle@porterhedges.com](mailto:brochelle@porterhedges.com)

-and-

**WILMER CUTLER PICKERING**

**HALE AND DORR LLP**

Andrew Goldman (admitted *pro hac vice*)  
Benjamin Loveland (admitted *pro hac vice*)  
250 Greenwich Street  
New York, New York 10007  
Telephone: (212) 230-8800  
Facsimile: (212) 230-8888  
[andrew.goldman@wilmerhale.com](mailto:andrew.goldman@wilmerhale.com)  
[benjamin.loveland@wilmerhale.com](mailto:benjamin.loveland@wilmerhale.com)

Counsel for Debtors and Debtors in Possession